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Peter DeVries, Council Chair
State Building Code Council
128 10th Ave SW
P.O. Box 42525
Olympia, Washington 98504-2525

Dear Mr DeVries,

The purpose of this letter is to support the testimony of Dr Neil Hampson of Virginia Mason Hyperbaric Medicine and Jim Williams of Washington Poison Center regarding the language in the proposed code for carbon monoxide (CO) alarms. I am writing you this letter in my capacity as a public citizen, concerned about prevention of carbon monoxide poisoning.

The attached list shows the modifications which we propose. In summary, we want to see removal of references to dwelling units “within which fuel-fired appliances are installed and in dwelling units that have attached garages”. I want to see CO alarms installed in all dwellings.

Our experience during the December 2006 windstorm was that most households in which people had severely toxic exposures to CO were households where a CO-emitting source (such as charcoal or a portable generator) was brought into proximity with the living space. The fact of being poisoned was not related to the presence or absence of installed fuel-fired appliances, nor to presence or absence of an attached garage, for most victims.

The SBCC is authorized by SSB-5561 to make limitations, provided they protect the public health: “The building code council may exempt categories of buildings classified as residential occupancies if it determines that requiring carbon monoxide alarms are unnecessary to protect the health and welfare of the occupants.” The “fuel-fired appliances” limitation proposed by SBCC does not, however, meet the standard established in statute: this exemption to the CO alarm installation requirement does not “protect the health and welfare of the occupants”. Any individual living in an exempt

dwelling under the SBCC proposed rules would not be protected by the presence of a CO alarm.

I believe that SBCC staff based the SBCC proposed language on the International Code Council (ICC) International Building Code (IBC). At present, there are 25 US states which have statutory/regulatory language mandating installation of CO alarms. Half of those rules do not include this limiting language. If the SBCC drops the limiting language, it will be basing that decision on scientific data. I believe that improvements in building codes are best when they are data-driven and evidence-based. I think that this is the spirit of the evolution of the IBC as envisioned by the ICC. The Washington SBCC can be well-positioned to propose this improvement in the language to the ICC for the 2010 IBC.

Sincerely,

/Steven Macdonald

Cc Tim Nogler, SBCC Managing Director